

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

**JOSEPH MORRIS, individually and on behalf of
All other similarly situated**

v.

**PATRICIA COYNE-FAGUE, in her capacity as the
Director of the State of Rhode Island Department of
Corrections, successor to ANTHONY TRAVISONO**

:
:
:
:
:
:
:
:
:
:

C.A. 69-cv-4192-JJM

AFFIDAVIT OF MATTHEW KETTLE

I, Matthew Kettle, being duly sworn, depose and state as follows:

1. I have been employed by the R.I. Department of Correction since 1989
2. I currently serve as the Assistant Director of Institutions & Operations (“ADIO”) of the R.I. Department of Corrections. I have served in this capacity since 2017. Prior to serving as “ADIO”, I served as Warden of the Maximum and High Security Facilities.
3. As part of my duties as “ADIO”, I am responsible for overseeing the overall operational practices that concern conditions of confinement in all confinement facilities.

4. I have personal knowledge that in all secured housing facilities, all cells are appropriately illuminated during the day and for a portion of the evening to allow for reading and writing. During sleeping hours, all cell lights are turned off and dimmer night lights are utilized to allow staff to monitor the health and safety of the offenders while maintaining an appropriate sleeping environment.



Matthew Kettle

Subscribed and sworn to before me in the City of Cranston, State of Rhode Island on this 17th day of January 2020.



NOTARY PUBLIC

Commission Expires:

Michael Corbett
6/21/20